

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
BEFORE THE IOWA UTILITIES BOARD

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| IN RE:<br><br>OFFICE OF CONSUMER ADVOCATE,<br><br>Petitioner,<br><br>v.<br><br>INTERSTATE POWER AND LIGHT,<br><br>Respondent. | DOCKET NO. FCU-2016-_____ |
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**REQUEST FOR FORMAL PROCEEDING**

COMES NOW the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, and for its Request for Formal Proceeding does hereby state:

1. On October 2, 2016, Alliant Energy, parent company of Interstate Power and Light Company (IPL), posted information indicating that its billing system did not work as intended. As a result, many customers received much higher bills because the bills included charges for prior months.

2. As of October 4, 2016, the Iowa Utilities Board's (Board) Customer Service Section had received over two hundred calls or inquiries. It is anticipated that the number of calls and inquiries will increase.

3. Pursuant to Iowa Code Section 476.3 (2015), the Board has the authority to initiate a formal proceeding at any time on the Board's own motion.

4. OCA requests that the Board initiate formal proceedings on its own motion for the following reasons:

- a. IPL has an obligation pursuant to Iowa Code section 476.3(1) (2015) to furnish reasonably adequate service.
- b. The number of calls and inquiries received by the Board indicates that service level was not met.
- c. Board rule 199 IAC 20.3(1) requires electricity to be sold on the basis of meter measurements.
- d. Board rule 199 IAC 20.3(6) requires actual meter readings and estimated readings only when an actual meter reading cannot be obtained.
- e. IPL is not complying with the Board's standards in rules 199 IAC 20.3(1) and 20.3(6) as indicated by the calls, inquiries, and information posted by Alliant Energy.
- f. The failed billings were the fault of IPL.
- g. The Board needs to investigate the cause of the failed billings and the actions to be taken to ensure the failed billings do not reoccur.
- h. IPL's customers were caught unaware and were deprived of the opportunity to mitigate their monthly bills through conservation practices, and as a result experienced damages.
- i. The large number of complaints filed by IPL's customers and the impact on those customers create exigent circumstances requiring quick action by the Board to mitigate future impact and damages to IPL's customers.

WHEREFORE, OCA respectfully requests that the Board initiate a formal proceeding to investigate and address the failure in IPL's billing system, to provide appropriate remedies pursuant to Iowa Code section 476.3 and for all other equitable relief appropriate under the circumstances.

Respectfully submitted,

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OFFICE OF CONSUMER ADVOCATE

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